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J.K. Motors

NHTSA 99 5507-2

Page 1

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Registered Importer R-90-006

Petition For Import Eligibility Determination

IAW 49 CFR 593.5 (A) (1)(ii)
VCP

DEPT. OF TRANSPORTATION
99 DEC 30 AM 10:54

March 24, 1999

To:	C :
Office of Vehicle Safety National Highway traffic Safety Administration Room 6111 400 Seventh Street, SW Washington, DC 20590	Office of Chief Counsel National Highway traffic Safety Administration Room 5219 400 Seventh Street, SW Washington, DC 20590

Ref: 1 Copy of Petition for Publication in Federal Register pursuant to 512.4(a) (4). Please publish this information immediately pursuant to 512.4(a)(5). Since the petition is being submitted as a "reporting requirement" we understand that "it will be placed in the public file or docket (i.e. the Federal Register immediately) pending the resolution of the claim for confidential treatment."

Dear Sirs:

The following is the basis for this petition

Part 593.6(b) (1)

The vehicle for which a determination is sought is a 1990 - 1999 Nissan GTS and GTR Models

Part 593.6(b) (2)

The following is a discussion of the necessary changes to bring this vehicle into conformity with all applicable Federal Motor Vehicle Safety Standards.

FMVSS 101 – Controls and Displays

Except as shown below, all controls and displays meet this FMVSS in the same manner as similar Nissan models i.e. the 300ZX turbo.

The word "BRAKE" must be added to the dash in place of the international ECE warning symbol.

The speedometer must be changed to one whose face shows MPH. The world speedometers are in Kilometers. This unit can be purchased from the parent manufacturer in England. We are also silk screening our own custom faces to meet this FMVSS.

The controls and displays are not exclusive to the GTR or GTS. They are identical to several Nissan models, most especially the 300ZX. A parts list will be included with the final report.

FMVSS 102 -Transmission Interlock

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. The markings, starter interlock, shifting pattern, and brake effect are identical to those in the 300ZX.

FMVSS 103 -Windshield Defrosting and Defogging Systems

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. The windshield defogging and defrosting systems are identical to those in similar US models i.e. the 300ZX, and 300ZX turbo.

FMVSS 104 -Windshield Wiping and Washing Systems

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. The windshield wiping and washing systems are identical to those in similar US models i.e. the 240SX, 300ZX, Maxima, and 300ZX Turbo.

FMVSS 105 – Hydraulic Brake Systems

There were no modifications necessary to bring this vehicle into compliance with this FMVSS.

The hydraulic brake system and the parking brake system are identical to those in similar US models. All parts of these systems are available from Nissan or alternate suppliers. [240SX, 300ZX Turbo, GTR-is 300ZX Turbo alternate High Performance Rally System certified for the USA.] Based on our engineering analysis the 300ZX Turbo and the Maxima which have the same hydraulic systems are the worst case examples of these Nissan systems. The 300 ZX Turbo and the Maxima are heavier and their ABS systems do not sample as quickly as the GTR systems. The Brembo High performance systems offer the

latest technological advances available in the production car market. The 300 ZX and the Maxima systems easily meet this FMVSS and by association the GTR and GTS also meet these standards. Complete engineering is available upon request.

FMVSS 106 – Brake Hoses

There were *no modifications* necessary to bring this vehicle into compliance with this FMVSS. The brake hoses are identical to those in the similar US models. The hoses have DOT markings from the factory.

FMVSS 108 – Lamps and Reflective Devices

The following modifications must be made to fully meet this FMVSS:

Install U.S. model headlamps and front side marker lights i.e. the 240 SX- 300ZX depending on year. The GTR has Xenon standard these are certified by the manufacturer and labeled as such. The marker lights and reflectors must be added to the GTR Xenon assemblies.

Tail lamp assemblies meet this FMVSS in all respects. However, Side markers and reflectors must be added for complete compliance. These are used from the similar. US model 240 SX Part #s 63141376977, and 63141376978 .

High-mounted stop light assembly comes standard in these cars and they are labeled DOT. However, all will be inspected for compliance with FMVSS.

FMVSS 109 • Tires

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. This vehicle came equipped with tires that bear the “DOT” symbol.

FMVSS 110 -Tire Selection and Rims

A tire placard must be installed to meet this FMVSS requirement. Rims on this vehicle have the dot stamp and ~~are~~ the same as 300ZX Turbo.

FMVSS 111 – Rear View Mirrors

The driver's inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be Labeled with “objects in mirror are closer than they appear” statement to fully comply with this FMVSS.

FMVSS 113 -Hood Latch Systems

No modifications were necessary to bring this vehicle into compliance with this FMVSS. The hood latch system is identical to the one used on the 300 ZX Turbo.

FMVSS 114 – Theft Prevention

For model years 1994 -1999 you must add only a key warning buzzer to bring these vehicles into compliance. The earlier vehicles (1993 – 1990) need the key warning and seat belt warning system from the 300ZX similar models added to bring them into compliance with this FMVSS. GTS uses the Maxima system and the GTR uses the 300 ZX Turbo system. A copy of the wiring diagram will be submitted with the final report.

CFR 541 – Theft Prevention Standard

N.A.

CFR 565 – Vehicle Identification Number Requirements

A “Vehicle Identification Plate” must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

FMVSS 116 -Brake Fluids

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. The vehicle came equipped with DOT brake fluid and the top of the master cylinder is labeled with the DOT information.

FMVSS 118 – Power Operated Window Systems

There are no modifications necessary to bring 1994 - 1999 vehicles into compliance with this FMVSS. Systems are the same as the 300ZX models of like years. The earlier vehicles need to have a relay added to the power window system to bring them into compliance.

FMVSS 124 – Accelerator Control Systems

No modifications were to necessary to bring this vehicle into compliance with this FMVSS. The accelerator control system is identical to similar US models 300ZX Turbo. It makes use of dual return springs. When either of the springs are disconnected the remaining spring closes the throttle completely bring this system into compliance with this FMVSS.

FMVSS 201 – Occupant Protection in Interior Impact

There were structural modifications to the dash area of the vehicle necessary to bring this vehicle into compliance with this FMVSS. They are more fully described in addendum “A” which is confidential. Compliance was proven in dynamics crash testing.

FMVSS 202 – Head Restraints

No modifications were necessary to bring this vehicle into compliance with this FMVSS. Compliance was proven in dynamic crash testing.

FMVSS 203 – Impact Protection for Driver from Steering Control Systems

No modifications were necessary to bring this vehicle into compliance with this FMVSS. Compliance was proven in dynamic crash testing.

FMVSS 204 – Steering Control Rearward Displacement

No modifications were necessary to bring this vehicle into compliance with this FMVSS. Compliance was proven in dynamic crash testing.

FMVSS 205 – Glazing Materials

There were no modifications necessary to bring this vehicle into compliance with this FMVSS. The glass and glazing materials used on this vehicle are identical to those used on the U.S. model.

FMVSS 206 – Door Locks and Door Lock Retention

No modifications were necessary to bring this vehicle into compliance with this FMVSS. Compliance was proven in dynamic crash testing.

FMVSS 207 – Seating Systems

Structural modifications to the seat frames were necessary to bring this vehicle into compliance with this FMVSS. These modifications are more fully described in addendum “A” which is confidential. Compliance was proven in dynamic crash testing.

FMVSS 208 – Occupant Crash Protection

This vehicle is equipped with lap and over the shoulder seat belts in all outboard seating positions. These are released by means of a single red button on the latch assembly. The belts are clearly marked with DOT Symbols.

Modifications were necessary to bring this vehicle into compliance with this FMVSS. Specific changes to the airbags were made to bring this vehicle into compliance. The airbags were replaced with components manufactured to petitioners specifications based on static and dynamic testing. These new air bags are more fully described in addendum "A" which is confidential. Compliance was proven in dynamic crash testing.

This vehicle is equipped with a seat belt warning lamp and audible buzzer that is identical to that used on similar US models. Airbag warning labels have been placed on each sun visor in order to meet this FMVSS.

FMVSS 209 – Seat Belt Assemblies

No modifications were necessary to bring this vehicle into compliance with this FMVSS. The seat belt labels are identical to those on similar U.S. models and they meet this FMVSS requirement;

FMVSS 210 – Seat Belt Assembly Anchorage

Modifications were necessary to bring this vehicle into compliance with this FMVSS. Structural modifications to the seat belts anchorage points were made they are more fully described in addendum in 'A' which is confidential. Compliance was proven in dynamic crash testing.

FMVSS 212 -Windshield, Mounting

Modifications were necessary to bring this vehicle into compliance with this FMVSS. Specific changes to the mounting methods were made to the vehicles. Adhesive was applied to the mounting surfaces. These modifications are more fully described in addendum "A" which is confidential. Compliance was proven in dynamic crash testing.

FMVSS 214 – Side Impact

Modifications were necessary to bring this vehicle into compliance with this FMVSS. Specific structural modifications were necessary to meet this FMVSS. These structural modifications are specifically described in addendum "A" which is confidential. Compliance was proven in dynamic crash testing.

49 CFR 581 or FMVSS 215 – Bumper Standards

No modifications were necessary to bring this vehicle into compliance with this FMVSS. The bumpers are of a normal plastic/nylon design impregnated with body color and are mounted with high-energy absorption components.

FMVSS 216 – Roof Crush Resistance

No modifications were necessary to bring this vehicle into compliance with this FMVSS. This vehicle has identical roof structure to the 300ZX. Engineering analysis has shown compliance based on this similarity.

FMVSS 219 -Windshield Intrusion Zone

No modifications were necessary to bring this vehicle into compliance with this FMVSS. Compliance was proven in dynamic crash testing.

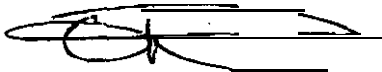
FMVSS 301 – Fuel System Integrity

Modifications were necessary to bring this vehicle into compliance with this FMVSS. Specific modifications were made to the fuel system in conjunction with EPA testing. These modifications were proven in front and rear crash testing. The modifications are more fully described in addendum "A" which is confidential.

FMVSS 302 – Flammability of Interior Materials

No modifications were necessary to bring this vehicle into compliance with this FMVSS. This vehicle is equipped with interior materials that are identical to those used on similar U.S. models including the 300ZX Turbo.

Thank you for your attention,

A handwritten signature in black ink, appearing to read 'Jonathan Weisheit', written over a horizontal line.

Jonathan Weisheit, Rep.